



3. Due to Plaintiffs' counsel's caseload, Plaintiffs are unable to complete the Response by the due date, despite efforts to do so.

4. Therefore, Plaintiffs are requesting an additional 14 days, or by February 19, 2015, to file the Response to the pending Motion to Dismiss.

5. Defendants' counsel is not opposed to the granting of this Motion, following e-mails between counsel. Defendant's counsel requests until March 12, 2015 to file a Reply brief, to which Plaintiffs are not opposed.

6. This Motion is not filed for dilatory purposes or for delay, but only so that Plaintiffs may fully present their arguments before the Court.

WHEREFORE, the Plaintiffs, Second Amendment Arms (a d/b/a of R. Joseph Franzese), R. Joseph Franzese, individually and d/b/a Second Amendment Arms, Robert M. Zieman, Sr., and Tony Kole, by and through undersigned counsel, request this Honorable Court grant them an extension of time until February 19, 2015 to file a Response to the Motion to Dismiss, as well as any and all further relief as this Court deems appropriate, including granting Defendants until March 12, 2015 for a Reply brief..

Respectfully submitted,

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/s/ David G. Sigale  
Attorney for Plaintiffs

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**CERTIFICATE OF ATTORNEY AND NOTICE OF ELECTRONIC FILING**

The undersigned certifies that:

1. On February 5, 2015, the foregoing document was electronically filed with the District Court Clerk *via* CM/ECF filing system;
2. Pursuant to F.R.Civ.P. 5, the undersigned certifies that, to his best information and belief, there are no non-CM/ECF participants in this matter.

/s/ David G. Sigale  
Attorney for Plaintiffs

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